

EXHIBIT 71

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CISCO SYSTEMS, INC.,)
Plaintiff,)
vs.) Civil Action No.:
ARISTA NETWORKS, INC.,) 5:14-cv-05344-BLF (PSG)
Defendant.)
_____)

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VIDEOTAPED DEPOSITION OF DEVADAS PATIL
Palo Alto, California
Sunday, February 21, 2016
Volume 1

Reported by:
RACHEL FERRIER, CSR No. 6948
Job No. 2223126

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1 Do you see that? 01:56PM

2 A Yes. 01:56PM

3 Q What are "MIB tables"? 01:56PM

4 A So "MIB tables" are the -- the storage that make 01:56PM

5 SNMP queries possible, so MIBs are -- essentially 01:56PM

6 support information for SNMP. 01:56PM

7 Q And so are -- are the tables different from the 01:56PM

8 MIBs themselves? 01:56PM

9 A MIBs -- MIB tables are like the blueprint for the 01:56PM

10 actual tables -- I'm sorry, MIB tables are the blueprint 01:56PM

11 for the actual MIB data, if that makes sense. 01:56PM

12 Q MIB tables -- I'm sorry, can you explain that? 01:56PM

13 So let me -- let me ask the question again. 01:57PM

14 How -- strike that. 01:57PM

15 Are tables different from the MIBs themselves? 01:57PM

16 A In -- in the -- and I have not used this language 01:57PM

17 for a long time, and I've not used SNMP in a long time, 01:57PM

18 but my understanding is that the language of SNMP -- in 01:57PM

19 the language of SNMP, the MIB table is like a blueprint. 01:57PM

20 It's called the data that is housed in the MIB. 01:57PM

21 Q And the -- the term "MIB table," that -- is that 01:57PM

22 a term that is familiar to those in networking industry? 01:57PM

23 MR. CANNON: Objection; vague, lacks foundation, 01:57PM

24 calls for improper opinion testimony. 01:57PM

25 THE WITNESS: Yes. 01:57PM

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1 BY MR. WONG: 01:57PM

2 Q And you certainly know what a "MIB table" is if 01:57PM

3 you heard that term used; correct? 01:58PM

4 A Yes. 01:58PM

5 Q And you would understand what a "MIB table" is 01:58PM

6 based upon your experience working in the networking 01:58PM

7 industry; correct? 01:58PM

8 A Yes. 01:58PM

9 Q What was the process at Cisco for selecting a 01:58PM

10 command syntax? And we can talk specifically about the 01:58PM

11 commands listed on Exhibit 316 -- 01:58PM

12 A Mm-hmm. 01:58PM

13 Q -- but -- so let me just rephrase the question, 01:58PM

14 actually. 01:58PM

15 For the commands listed in Exhibit 316, what was 01:58PM

16 the process at Cisco for selecting the command syntax? 01:58PM

17 MR. CANNON: Objection; vague, lacks foundation, 01:58PM

18 calls for speculation. 01:58PM

19 THE WITNESS: Well, there is -- the -- the 01:58PM

20 product owner, which is me, lead developer for the 01:58PM

21 product, comes up with initial proposal, and it is, 01:58PM

22 essentially, reviewed by a group of people that are 01:58PM

23 highly experienced for -- for usability and 01:59PM

24 extensibility, and so on, so there are certain criteria 01:59PM

25 that they look -- look at, including usability, 01:59PM

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1 A Yes. 02:00PM

2 Q How were those individuals listed on the cover 02:00PM

3 page of Exhibit 317 involved in coming up with the 02:00PM

4 syntaxes for the commands listed on Exhibit 316? 02:01PM

5 A Well, they -- they -- they're also quite 02:01PM

6 experienced in developing these -- these -- these types 02:01PM

7 of commands, and they give an initial opinion on whether 02:01PM

8 to take it to the next level and get it -- get it 02:01PM

9 reviewed by parser-police, so there were initial -- 02:01PM

10 initial -- there would basically be an initial 02:01PM

11 verification of the usability and extensibility criteria 02:01PM

12 that we talked about earlier. 02:01PM

13 Q Looking at the cover page of Exhibit 317 -- 02:01PM

14 A Yes. 02:02PM

15 Q -- was Mr. Deepak Kumar involved in creating the 02:02PM

16 command syntaxes for the commands listed on Exhibit 316? 02:02PM

17 MR. CANNON: Objection; vague. 02:02PM

18 THE WITNESS: I mean, in -- in all as a reviewer, 02:02PM

19 yes, but I came up with the initial proposal. 02:02PM

20 BY MR. WONG: 02:02PM

21 Q Is that true for each of the individuals listed 02:02PM

22 on the cover of Exhibit 317? 02:02PM

23 MR. CANNON: Objection; vague. 02:02PM

24 THE WITNESS: For Exhibit 317, these -- 02:02PM

25 these were -- these were engineers in my immediate 02:02PM

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1 Q What do you mean by that? 02:36PM

2 A What I mean by that is whatever syntax we are 02:36PM

3 using at the global level, let's keep it similar at the 02:37PM

4 interface level so that we have -- we have consistency 02:37PM

5 and, naturally, the skills transfer associated with 02:37PM

6 consistency. 02:37PM

7 Q So similar to what we were talking about with 02:37PM

8 respect to Exhibit 320, the prior e-mail that we were 02:37PM

9 talking about? 02:37PM

10 A Yes. 02:37PM

11 Q Further on in this paragraph on Exhibit 321, 02:37PM

12 after "c," you say, "there aren't many org-specific 02:37PM

13 commands belonging to MED, IEEE, IETF to warrant a 02:37PM

14 strict hierarchy." 02:37PM

15 Do you see that? 02:37PM

16 A Yes. 02:37PM

17 Q What do you mean by a "strict hierarchy" there? 02:37PM

18 A I -- I -- I think the contention was between 02:37PM

19 creating a middle order node and listing all the options 02:38PM

20 below or to create whole -- whole commands for each 02:38PM

21 option, and I was -- I don't recall exactly what 02:38PM

22 position I took, but I -- I was always inclined to 02:38PM

23 support the usability story and the consistency story, 02:38PM

24 and there aren't many -- many aren't specific commands 02:38PM

25 belonging to MED, IEEE, and IETF to warrant strict 02:38PM

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1 hierarchy. 02:38PM

2 If you want a strict hierarchy, you would have an 02:38PM

3 intermediate node and list all the specific options, but 02:38PM

4 since there aren't any, I might have taken this 02:38PM

5 position; although, it's -- it's -- it may seem a little 02:38PM

6 bit weak for in terms of future-proofing things. 02:38PM

7 So there's a -- there's a -- there's a balance 02:39PM

8 between future-proofing and -- and verbosity, and -- and 02:39PM

9 the more you try to feature-proof, the more verbose you 02:39PM

10 can become, so it's more of a subjective column how you 02:39PM

11 design, keeping all of these in mind, yeah. 02:39PM

12 Q Thank you. 02:39PM

13 And after letter "d" on Exhibit 321, you say, 02:39PM

14 quote: It is more intuitive for first-time users, end 02:39PM

15 quote. 02:39PM

16 Do you see that? 02:39PM

17 A Yes. 02:39PM

18 Q What did you mean by that? 02:39PM

19 A This means that -- that user interface should 02:39PM

20 flow naturally in a sense that if I've never used 02:39PM

21 anything similar, I should be pretty much able to -- I 02:39PM

22 should be able to come in and type in a reasonable 02:39PM

23 keyword for things and get help on it and be able to 02:40PM

24 complete a configuration within a reasonable amount of 02:40PM

25 time rather than going through hours of research on it. 02:40PM

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1 Q And that approach that you just described, did 02:40PM
2 you apply that approach for the commands that are listed 02:40PM
3 in Exhibit 316? 02:40PM

4 MR. CANNON: Objection; vague. 02:40PM

5 THE WITNESS: The -- what is 316? This is the 02:40PM
6 one -- okay. This -- it -- it certainly influenced our 02:40PM
7 structure for these commands. Yeah, so intuitiveness, 02:40PM
8 extensibility, usability, aesthetics are all factors 02:40PM
9 that we considered. 02:40PM

10 BY MR. WONG: 02:41PM

11 Q Let's look at Exhibit 316 now, Mr. Patil. 02:41PM

12 A Yeah. 02:41PM

13 Q Starting with the first command, you were 02:41PM
14 associated with "clear lldp counters." 02:41PM

15 Do you see that? 02:41PM

16 A Yes. 02:41PM

17 Q What function does the "clear lldp counters" 02:41PM
18 command perform? 02:41PM

19 A It's basically a reset, if you will, of all the 02:41PM
20 statistics that have been accumulated over a period of 02:41PM
21 time, and if you want to start off on a clean slate 02:41PM
22 again at a certain period of time on a -- on a certain 02:41PM
23 router or switch, then you could issue that command and 02:42PM
24 it will clear all the statistics. 02:42PM

25 Q And how long did it take you, approximately, to 02:42PM

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1	come up with the syntax of "clear lldp counters"?	02:42PM
2	MR. CANNON: Objection; vague.	02:42PM
3	THE WITNESS: Oh, just that one command?	02:42PM
4	MR. WONG: Mm-hmm.	02:42PM
5	THE WITNESS: I don't know, 15 minutes.	02:42PM
6	BY MR. WONG:	02:42PM
7	Q Okay. How long did it take you, approximately,	02:42PM
8	to do the source code writing to implement the	02:42PM
9	functionality for the "clear lldp counters" command?	02:42PM
10	MR. CANNON: Objection; vague, assumes facts not	02:42PM
11	in evidence.	02:42PM
12	THE WITNESS: Okay. That would be, again,	02:42PM
13	15 minutes, and I have to add that this is a easiest one	02:42PM
14	to implement.	02:42PM
15	BY MR. WONG:	02:42PM
16	Q For the "clear lldp table" command --	02:42PM
17	A Mm-hmm.	02:42PM
18	Q -- what functionality does that perform?	02:43PM
19	A That is, again, a reset, but more at the enable	02:43PM
20	level in the sense that, let's say, a device comes up	02:43PM
21	and it discovers ten neighbors and we want to come in	02:43PM
22	and manually reset the table by making it forget all	02:43PM
23	those ten neighbors instantly, then we would use that	02:43PM
24	command.	02:43PM
25	Q And approximately how long did it take you to	02:43PM